

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

PATRICK A. ROSE
Assistant United States Attorney
Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Patrick.Rose@usdoj.gov

Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-VCF

**Unopposed Motion for Extension of
Time**

(Fourth Request)

The Federal Defendants respectfully move for a 30-day extension of time, from November 20, 2023, to December 20, 2023, to file a response to Plaintiff's Complaint (ECF No. 1). This is the fourth request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who agrees with this request. Indeed, Plaintiff's counsel would like additional time to confer with his client.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, the parties continue to assess recent developments at the agency level. Plaintiff's counsel would like additional time to confer with his client. Defense counsel has a number of pressing matters in other cases including a

1 motion for summary judgment due on November 20, 2023, and an upcoming settlement
2 conference for which settlement authority must be sought. Additionally, there is the
3 prospect of a lapse of congressionally-funded appropriations on November 17, 2023.
4 Lapses of appropriations negatively affect the availability of personnel at the USAO, client
5 agencies, or both to conduct business.

6 This motion is filed in good faith and not for the purposes of undue delay.
7 Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel consents to,
8 this extension of time, from November 20, 2023, to December 20, 2023, to file a response
9 to Plaintiff's Complaint.

10 Respectfully submitted this 14th day of November 2023.

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ Patrick A. Rose
14 PATRICK A. ROSE
Assistant United States Attorney

15
16 **IT IS SO ORDERED**

17
18 

19 **UNITED STATES MAGISTRATE JUDGE**

20 **DATED:** 11-14-2023